UNDERSTANDING PJR'S PRO-3 AND RELATED BYLAWS GOVERNING PROPER PROMOTION OF YOUR MANAGEMENT SYSTEM CERTIFICATION

PRESENTED BY: JOSEPH KROLIKOWSKI,

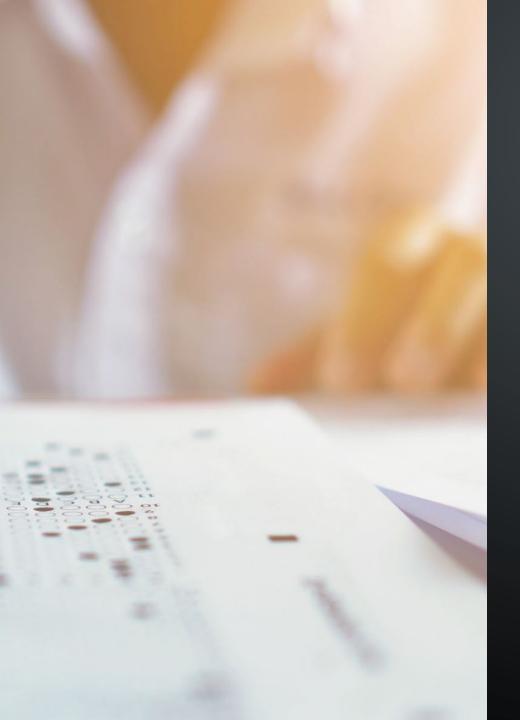QMS PROGRAM MANAGER/ EXECUTIVE COMMITTEE MEMBER

PLEASE NOTE:

- All participants have been muted.

- Please type your questions in the "Question" section of the dashboard – we will take questions at the conclusion of this presentation.

- Please note that copies of today's presentation will be available for download shortly.

- This webinar (and all other past PJR webinars) will also be available for re-viewing on our website under "Previously Recorded Webinars."

POLLS!

- Please respond to PJR's polls

TODAY'S PRESENTATION WILL COVER:

- What is the PJR PRO-3 document?

- Where is it established that I must abide by these requirements?

- Where can I obtain the PJR PRO-3 document?

- Where do these requirements come from?

- Common sense explanations of what the requirements mean

- Ramifications for noncompliance

- Conclusion/Questions

WHAT IS THE PRO-3 DOCUMENT?

- The full title of PJR's PRO-3 document is "*Procedure for Publicizing/Advertising Certification and Use of the PJR Logo, Standard Licensing Body Logos and Accreditation Body Symbols.*"
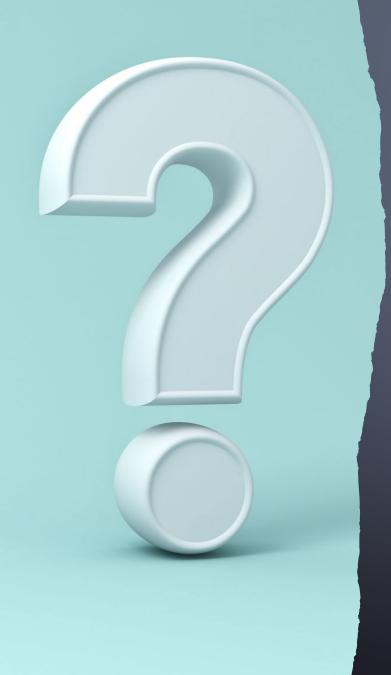
- We wrote this document to ensure that PJR and its certificated clients are best enabled to remain in compliance with the many industry and accreditation body requirements that pertain to promotion of certification.

WHERE IS IT ESTABLISHED THAT I MUST ABIDE BY THESE REQUIREMENTS? (1 OF 2)

- Compliance with PRO-3 and other related requirements is required in two key aspects:

- Any ISO 9001 (or other Annex SL rooted document) certified client is subject to the bylaws of the industry at large and from PJR specifically. This makes PJR and all other related interests "relevant interested parties" as referenced in clause 4.2 from ISO 9001:2015.

- This is also a contractual matter. PJR's contractual terms and conditions (F-3tc) includes the following contractually binding statements:

  - *Organization warrants and covenants with PJR that it will use all registration marks properly (see applicable PRO-3's latest revision available to clients at http://www.pjr.com) and include the rules for their use in their documented procedures.*

  - *Organization warrants and covenants with PJR that it will at all times, during the term of the Agreement, comply with all reasonable requirements necessary for the issuance of the Registration Certificate of Approval. This includes, but is not necessarily limited to complying with all statutes, rules, or regulations issued by any statutory or other regulatory authority; the release of information and/or on-site visits by regulatory bodies such as the FAA, JAA, OEM AAQG, IAQG members or Accreditation Bodies as may be required.*

WHERE CAN I OBTAIN A COPY OF PRO-3?

PJR is required to make certain documents (including the PRO-3) available in a publicly accessible manner.

We have created a page on our website titled *"Registration Document Download."*

If you visit www.pjr.com you can scroll to the bottom of the PJR homepage to find this link .

WHERE DO REQUIREMENTS PERTAINING TO PROMOTION OF CERTIFICATION COME FROM?

- There are numerous layers of industry (ISO) as well as Accreditation Body (ANAB, UKAS, etc.) requirements that are applicable when an organization wants to promote their certification.

- Here are some examples of requirements that apply to this practice. Some of these will be directly referenced during today's presentation. Where applicable we've indicated if the document is public domain (free to download) with a "PD" marking. Please note this list is not exhaustive and does not cover all PJR accreditations.

  - ISO 17021-1:2015 – this document can be thought of as "ISO 9001 for certification bodies" like PJR
  - ANAB's PR 1018 – *"Policy on Use of ANAB Accreditation Symbols and Claims of Accreditation Status"* (PD)
  - UKAS' *"Accreditation Logo and Symbols - The National Accreditation Logo and Symbols: Conditions for use by UKAS and UKAS accredited organizations"* (PD)
  - IATF Rules 6th Edition
  - FSSC Foundation's FSSC 22000 Scheme Requirements – part 2 *"Requirements for organizations to be audited"* (PD)
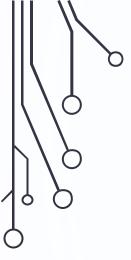 - SERI License Agreement for R2 Certification, Appendix C

ARE THERE COMMON ASPECTS OF THESE REQUIREMENTS?

- Most of the aforementioned requirements present the following common themes when it comes to promotion of a management system certification:

  - Organizations cannot advertise their certification in any way that states or implies that the certification applies to any non-certified locations; and

  - Organizations cannot reference their certification in any way that states or implies that their products and/or services are certified.
    - We will cover what is meant by this statement later in the presentation.

STARTING AT THE TOP – THE OFFICIAL ISO LOGO

- You cannot (for any reason) use the official ISO logo.

- The International Organization for Standardization (or ISO) takes the matter of its own logo very seriously and has strong language on its website about potential legal ramifications for noncompliance.

- You are encouraged to visit the ISO website itself for more details on this - https://www.iso.org/iso-name-and-logo.html
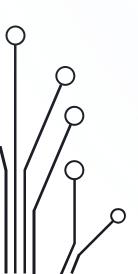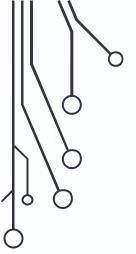
THE ACCREDITATION BODY LOGOS

Here in the United States the primary logo that appears on most client certificates is from the ANSI National Accreditation Board (ANAB)

Internationally, PJR has accreditations through four other recognized bodies:

- UKAS – United Kingdom Accreditation Service
- ema - entidad mexicana de acreditación (Mexico)
- Accredia (Italy)
- JAB (Japan)

THE ACCREDITATION BODY LOGOS

In terms of sectors, PJR has even more accreditations, including:

- IATF – International Automotive Task Force
- R2 – granted by Sustainable Electronics Recycling International (SERI)
- RIOS (Recycling Industry Operating Standard)
- FSSC Foundation

All of these accreditation bodies have a logo that is used on the client's certificate where appropriate.

USAGE OF ACCREDITATION BODY LOGOS

- Most of the aforementioned accreditation bodies allow a certified company to use the AB logo on websites, marketing materials, etc.
  - IATF and ema are two notable exceptions to this – in both cases these bodies mandate that their logo can ONLY appear on the official registration certificate itself.
    - Please note in these cases the IATF or ema accredited certificate CAN be displayed on the website.

- Almost all of the accreditation bodies that permit additional usages of their logo mandate the same two part requirement:
  - The AB logo cannot be used without the CB (PJR) logo;
    - FSSC does NOT require this.
  - The AB logo cannot be used in any manner as to imply that the products and/or services themselves are certified.

A NOTABLE COMPLICATION FROM UKAS

- A careful read of UKAS' requirements document reveals the following mandate:

  - *"The national accreditation symbol and the certification body mark shall be enclosed in a box."*

- PJR has had some clients who wished to use the UKAS and ANAB logos (for example) on their website.

  - Placing the PJR and UKAS logos in a box (as directed above) was interpreted by ANAB as indicating that ANAB was accrediting UKAS (which is of course not the case.)

WHAT DOES THIS MEAN IN PLAIN ENGLISH?

- If you desire to have more than one AB logo on your website, marketing material, etc. **you need to use the PJR logo multiple times as well.**

- Please note this also means the logos are in close proximity to each other.

NO!   YES!

YOUR BEST BET?
A CUSTOM LOGO!

- PJR encourages its clients to get creative in marketing your management system certification.

- Have your art department (or your web designer) come up with an eye catching logo that incorporates your existing company logo or brand.

- In this way you'll be assured that you're not running afoul of any AB requirements and you'll stand out from your competition.

PLACING THE CERTIFICATE ON THE WEBSITE – TWO COMMON MISTAKES

- For most organizations, the optimum strategy for marketing their certification involves putting a copy of their certificate somewhere on their website. PJR has seen two common issues with how this is executed:

  - The certificate is presented in color and can be downloaded.
    - Please note that the accreditation bodies each have mandates on what colors must be used (right down to referencing Pantone branded color specifications.) Color reproductions of these may not meet the AB requirements leading to issues later.
    - Companies are encouraged to stick to black and white copies of the certificates on the websites or otherwise take steps to ensure it can't be downloaded.

  - The certificate on the website isn't the current certificate.
    - Please note that you are permitted to present a "certificate history" if you choose, but you must ensure that your most current certificate is always displayed.

OTHER ISSUES ON WEBSITES

- Here are some other common issues that we see on websites:

  - A website with a banner that reads "ISO Certified"
    - Understand that there are hundreds of ISO standards – you must indicate WHICH standard you're referring to (ISO 9001, ISO 14001, etc.)

  - A website with a common header that references the management system certification on pages referencing activities or locations that aren't actually part of the certification.
    - For example – a company whose offices in Michigan are ISO 9001 certified, but their website discusses other locations in Indiana, Wisconsin, and Ohio – all under banners that read "ISO 9001 certified."
    - Or – a company who's ISO 9001 certification is limited to their Machine Shop operations, but the ISO 9001 certification is referenced on pages discussing Foundry Operations.

WHAT DO WE REALLY MEAN WHEN WE SAY – "DON'T INDICATE THE PRODUCT/SERVICE IS CERTIFIED?" (1 OF 3)

There are a few very specific cases that are outlined in PRO-3 and in the AB's own mandates. Let's review these now:

- The certification being referenced on a document directly related to a product – such as an inspection report, certificate of analysis, certificate of approval, etc.

WHAT DO WE REALLY MEAN WHEN WE SAY – "DON'T INDICATE THE PRODUCT/SERVICE IS CERTIFIED?" (2 OF 3)

- The certification being referenced on product packaging (whether individual or bulk packaging.)

  - Product Packaging is defined in PRO-3 thusly *"Product packaging is considered as that which can be removed without the product disintegrating or being damaged."*

- In certain cases it is permitted to reference the certification on product packaging but there is much more detail that must be provided (i.e. it can't just say "ISO 9001 certified")

WHAT DO WE REALLY MEAN WHEN WE SAY – "DON'T INDICATE THE PRODUCT/SERVICE IS CERTIFIED?" (3 OF 3)

- If you choose to reference your certification on product packaging – it must include the following:

    - Identification (e.g. brand or name) of the certified organization
    - The type of management system (e.g. quality, environmental) and the applicable standard; and
    - Identification of PJR as the Certification Body issuing the certificate

- For example – *"This product is manufactured by ABC plant of XYZ company certified to ISO 9001 (Quality Management System) by PJR"*

RAMIFICATIONS FOR NONCOMPLIANCE

- Noncompliance with logo usage or related requirements can absolutely be cited as a nonconformance in the context of an audit (or even outside of an audit.)

- As mentioned earlier in the presentation – PJR, the ABs, and the ISO itself are all relevant interested parties in your certification and thus fall under clause 4.2 of any Annex SL based standard.

- Failure to effectively respond to a nonconformance can lead to certificate suspension and even certificate withdrawal.

CONCLUSION

PJR shares your excitement at attaining your management system certification and we encourage you to promote it to the fullest extent possible.

At the same time – we must ensure the promotion of your certification is done in accordance with the many applicable bylaws and requirements that we're held accountable to.

PLEASE TUNE IN FOR ONE OF OUR OTHER WEBINARS

- *"The Interaction of Processes and its importance to a successful audit"* is shown on a semi-annual basis.

  - This webinar explores the crucial topic of processes and how to correctly understand them.

- *"Non-Applicable Clauses, Permissible Exclusions, Exemptions - Developing a better understanding of what can and what cannot be excused in an audit assessment"* is presented on a semi-annual basis.

  - This webinar explores the critical topic of exemptions and the right approach to take in determining which apply to you.

- We offer a variety of webinars on other topics including Stage 1 Audits, ISO 9001:2015, AS9100, ISO 13485:2016, IATF 16949, and ISO 14001:2015.

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